

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION

IN RE:	*	CHAPTER 7
GLENDAL. SHANNON	*	CASE NO: 17-40832
SSN: ***-**-2906		
5759 LEXINGTON DRIVE	*	
COLUMBUS, GA 31907	*	
	*	
DEBTOR,	*	

**NOTICE OF MOTION**

The Movant(s) in the above-styled Bankruptcy matter, has filed documents with the Court to Set Aside Discharge and Reopen Case.

**YOUR RIGHTS MAY BE AFFECTED.** You should read these papers carefully and discuss them with your attorney, if you have one in this Bankruptcy Case. **If you do not have an attorney, you may wish to consult one.** If not served with this notice in accordance with the Bankruptcy Code or the Federal Rules of Bankruptcy Procedure, a copy of the motion may be obtained upon written request to counsel for the Movant(s) (identified below) or at the Clerk's office.

If you do not want the Court to grant the motion, or if you want the Court to consider your views on the motion, then you or your attorney must file with the Court a written objection or response on or before **July 5, 2018**. If you are receiving this notice by mail, you may add three (3) days to the response date stated above. The objection or response should be sent to:

Clerk, U.S. Bankruptcy Court  
Middle District of Georgia  
P.O. Box 2147  
Columbus, GA 31902

If an objection or response is filed, a hearing on the motion shall be held on:

July 23, 2018 at 2:00 P.M., at the  
U.S. Bankruptcy Court  
1 Arsenal Place, Suite 309  
901 Front Avenue  
Columbus, GA 31901

If you mail your objection or response to the Court for filing,

you shall send it early enough so the Court will **receive** the objection or response on or before the response date stated above.

Any response or objection shall also be served on the movant(s)/debtor(s).

If you or your attorney does not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an Order granting that relief.

This notice is sent by the undersigned pursuant to LBR 9004-1(c)(5)(B).

This 13<sup>th</sup> day of June 2018.

AREY & CROSS, P.C.

By: AAC f WJC w/ ay p  
America A. Cross  
Attorney for Debtor(s)  
4800 Armour Road  
Columbus, GA 31904  
(706) 596-6745  
State Bar No: 191070 GA

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	*	
DEBTOR,	*	

MOTION TO SET ASIDE DISCHARGE AND REOPEN CASE

COMES NOW, Glenda L. Shannon, Debtor herein, and respectfully requests this Honorable Court to set aside the Discharge and Reopen Case, and show as follows:

1.

On August 25, 2017, Debtor filed in the Middle District of Georgia her Chapter 7 Bankruptcy Petition.

2.

On January 17, 2018, this case was closed and the Trustee discharged.

3.

The Debtor moves this Honorable Court to set aside the Discharge and Reopen her Chapter 7 Case to allow the debtor to convert her Chapter 7 Case to a Chapter 13 Case.

**WHEREFORE**, the Debtor prays that the motion to set aside discharge and the case be reopened for the purpose of converting her Chapter 7 Case to a Chapter 13 Case, and for other and

further relief as is just.

This 13<sup>th</sup> day of June 2018.

AREY & CROSS, P.C.

By: AAC f/wsc w/ey p  
America A. Cross  
Attorney for Debtor  
4800 Armour Road  
Columbus, Ga 31904  
State Bar No. 191070 GA  
(706) 596-6745

CERTIFICATE OF SERVICE

I, America A. Cross, certify that I am and, at all times hereinafter mentioned, was more than 18 years of age; that on the date below, I served a copy of the within Motion to Set Aside Discharge and Reopen Case by electronically mailing or placing copies of the same in the United States Mail with appropriate postage affixed thereon to insure proper delivery addressed as follows:

SEE ATTACHED DISTRIBUTION LIST

I, certify under penalty of perjury that the foregoing is true and correct.

Executed on 6/13/2018

By: AAC f wjc w/eyg  
AREY & CROSS, P.C.  
America A. Cross  
Attorney For Debtor  
4800 Armour Road  
Columbus, GA 31904  
State Bar No: 191070 GA  
(706) 596-6745

Label Matrix for local noticing  
113G-4  
Case 17-40832  
Middle District of Georgia  
Columbus  
Tue Jun 12 12:40:41 EDT 2018

Nissan Motor Acceptance Corporation  
c/o Stewart, Zliten & Jungers, Ltd.  
2860 Patton Road  
Roseville, MN 55113-1100

State Farm Bank  
c/o Becket and Lee LLP  
PO Box 3001  
Malvern, PA 19355-0701

4  
901 Front Avenue  
P.O. Box 2147  
Columbus, GA 31902-2147

Atlanta Postal Credit Union  
3900 Crown Road  
Atlanta, GA 30380-0001

Chase Credit Card  
P.O. Box 15298  
Wilmington, DE 19850-5298

Dillards  
Wells Fargo  
P.O. Box 14517  
Des Moines, IA 50306-3517

Home Depot Credit Service  
P.O. Box 6497  
Sioux Falls, SD 57117-6497

JC Penney  
Synchrony Bank  
P.O. Box 960001  
Orlando, FL 32896-0001

Macy's  
P.O. Box 8218  
Mason, OH 45040-8218

(p)CREDITORS BANKRUPTCY SERVICE  
PO BOX 800849  
DALLAS TX 75380-0849

(p)NISSAN MOTOR ACCEPTANCE CORPORATION  
LOSS RECOVERY  
PO BOX 660366  
DALLAS TX 75266-0366

SPS  
Select Portfolio Servicing, Inc.  
P.O. Box 551170  
Jacksonville, FL 32255-1170

Sam's Club  
Synchrony Bank  
P.O. Box 965004  
Orlando, FL 32896-5004

State Farm Bank  
Bankruptcy Dept.  
P.O. Box 3001  
Malvern, PA 19355-0701

TJX Rewards  
SYNCB  
P.O. Box 103104  
Roswell, GA 30076-9104

Tristan Shannon  
5759 Lexington Drive  
Columbus, GA 31907-6778

U.S. Trustee - MAC  
440 Martin Luther King Jr. Boulevard  
Suite 302  
Macon, GA 31201-7987

Walter Shannon  
5759 Lexington Drive  
Columbus, GA 31907-6778

America A. Cross  
Arey & Cross, P.C.  
4800 Armour Road  
Columbus, GA 31904-5231

Glenda L. Shannon  
5759 Lexington Drive  
Columbus, GA 31907-6778

Walter W Kelley  
Chapter 7 Trustee  
P.O. Box 70879  
Albany, GA 31708-0879

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Military Star  
Army Exchange Credit Program  
P.O. Box 650410  
Dallas, TX 75262-0410

Nissan Motor Acceptance Corp.  
Bankruptcy Department  
8900 Freeport Parkway  
Irving, TX 75063-2438

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)State Farm Bank	End of Label Matrix	
c/o Becket and Lee LLP	Mailable recipients	21
PO Box 3001	Bypassed recipients	1
Malvern PA 19355-0701	Total	22